

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

BRYAN SAMS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:24-cv-00602-SH
)	
JOHNSON MATTHEY, INC., d/b/a)	Removed from Tulsa County
TRACERCO, a foreign corporation,)	Case No. CJ-2024-4271
THE UNIVERSITY OF TULSA, a not-for-)	
profit Oklahoma Corporation,)	
CHEVRON USA, INC., a foreign corporation)	
CHASE ENVIRONMENTAL GROUP, INC.)	
a foreign corporation,)	
CHINA INSTITUTE OF ATOMIC ENERGY)	
a foreign corporation,)	
)	
Defendants.)	

**DEFENDANT CHEVRON U.S.A. INC.'S
MOTION FOR ADMISSION *PRO HAC VICE***

The undersigned hereby moves this Court, pursuant to LGnR4-2(h) and 4-3 of the United States District Court for the Northern District of Oklahoma, for an Order admitting Mary Rose Alexander *pro hac vice* in this action on behalf of Defendant Chevron U.S.A. Inc. This Motion is also supported by the following:

1. Ms. Alexander's business address is Latham & Watkins LLP, 330 North Wabash Avenue, Suite 2800, Chicago, Illinois 60611, telephone (312) 876-7672; fax: (312) 993-9767.

2. Pursuant to LGnR4-3(a), Ms. Alexander will be associated in this matter with Mary Quinn Cooper and Matthew C. Cecconi of the law firm McAfee & Taft, Williams Center Tower II, Two West Second Street, Suite 1100, Tulsa, Oklahoma 74103. Both Ms. Cooper and Mr. Cecconi are members of the bar of this Court.

3. Pursuant to LGnR4-3(b), Ms. Alexander is a member in good standing of the following courts:

- i. Supreme Court of Illinois, ARDC number 6205313
(Admitted November 8, 1990)
- ii. Supreme Court of California, Bar number 143899
(Admitted December 11, 1989)
- iii. United States Court of Appeals for the Sixth Circuit
(Admitted September 8, 1993)
- iv. United States Court of Appeals for the Third Circuit
(Admitted January 14, 2019)
- v. United States Court of Appeals for the Seventh Circuit
(Admitted June 13, 1997)
- vi. United States Court of Appeals for the Eighth Circuit
(Admitted August 27, 2003)
- vii. United States Court of Appeals for the Ninth Circuit
(Admitted September 20, 2005)
- viii. United States Court of Appeals for the Tenth Circuit
(Admitted October 6, 2015)
- ix. United States District Court for the Central District of California
(Admitted November 5, 2013)
- x. United States District Court for the Northern District of Illinois,
General Bar (Admitted November 19, 1990)
- xi. United States District Court for the Eastern District of Michigan
(Admitted September 27, 2006)
- xii. United States District Court for the Eastern District of Texas
(Admitted December 3, 2013)
- xiii. United States District Court for the Eastern District of Wisconsin
(Admitted September 26, 2008)
- xiv. United States District Court for the Western District of Wisconsin
(Admitted July 20, 2012)
- xv. United States District Court for the Central District of Illinois
(Admitted January 23, 2020)
- xvi. United States District Court District of Colorado
(Admitted October 31, 2017)
- xvii. United States District Court of the Northern District of California
(Admitted November 14, 2013)

xviii. United States District Court of the Northern District of Illinois, Trial Bar
(Admitted January 8, 2013)

xix. AM22094, U.S. Tax Court
(Admitted February 14, 2022)

4. Pursuant to LGnR4-2(h), this Motion is accompanied by a completed Request for Admission Pro Hac Vice form for Ms. Alexander (Ex. A) along with the required fee.

WHEREFORE, Defendant, Chevron U.S.A. Inc respectfully requests that the Court enter an Order admitting Mary Rose Alexander *pro hac vice* in this matter.

Respectfully submitted,

/s/ Mary Quinn Cooper

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following registrants:

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